LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
  Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,
  Defendants.

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Case No. 5:21-cv-844-XR
[Lead Case]

EXHIBIT D

LA UNIÓN DEL PUEBLO ENTERO, *et al.*, Plaintiffs, v. GREGORY W. ABBOTT, *et al.*, Defendants.	Civil Action No. 5:21-cv-844 (XR) (Consolidated Cases)

UNITED STATES' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, the United States of America requests that Defendants the State of Texas and John Scott identify and produce the documents and items requested below for inspection and copying and deliver copies to counsel for United States by December 12, 2021.

INSTRUCTIONS AND DEFINITIONS

1.   "Defendants" means defendants State of Texas and John Scott and any of their past or present agents, advisors, employees, representatives, attorneys, consultants, contractors, or other persons or entities acting on Defendants' behalf or subject to Defendants' control.

2.   "SB 1" means the Election Integrity Protection Act of 2021, S.B. 1, 87th Legis., 2d Spec. Sess. (Tex. 2021), which amends the Texas Election Code relating to, among other topics, voter assistance, applications for ballots by mail, and mail ballot carrier envelopes.

3.   In construing these requests, apply the broadest construction, so as to produce the most comprehensive response. Construe the terms "and" and "or" either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might

otherwise be construed to be outside that scope. Words used in the masculine gender include the feminine, and words used in the singular include the plural.

4. The United States requests that Defendants meet and confer to plan and execute the orderly and accurate production of the database excerpts requested below no later than November 19, 2021, and as part of such a meeting, include the custodians of the databases referenced below, as well as technicians with sufficient knowledge to explain the content and format of the databases and requested fields.

5. For each request for the production of database excerpts, the production shall share a common snapshot date subsequent to the inclusion of all data concerning the November 2, 2021 constitutional amendment elections in the Texas Election Administration Management System (TEAM) from each and every county.

6. Should all county data concerning the November 2, 2021 local elections not be integrated in TEAM sufficiently prior to December 12, 2021, to permit a timely response to these requests, counsel for the United States and Texas shall meet and confer to reach a mutually agreed upon production date.

DOCUMENT REQUESTS

1. All database dictionaries and user manuals related to the Texas Election Administration Management (TEAM) database, the driver license and personal identification card database, and the election identification certificate database.

2. The contents of all fields contained within the State of Texas's voter registration database, also known as the Texas Election Administration Management System (TEAM), used to determine voter eligibility; to implement or enforce SB 1; to record voter history in any federal, state, or municipal election since 2016 (including whether the individual cast a ballot by

mail and whether the individual received voter assistance); to establish the correct driver's license, election identification certificate, personal identification card, or partial social security number for each voter under procedures established by Section 5.02 of SB 1 (to be codified at Tex. Elec. Code § 84.002) and Section 5.08 of SB 1 (to be codified at Tex. Elec. Code § 86.002); to identify absent uniformed services voters and overseas voters entitled to the protections of the Uniformed and Overseas Citizens Absentee Voting Act, 52 U.S.C. §§ 20301-11, Chapter 101 of the Texas Election Code, Tex. Elec. Code §§ 101.001-.109, or Chapter 114 of the Texas Election Code, Tex. Elec. Code §§ 114.001-.008; and to identify voters who have reported or established disability status for voting purposes.

    a. With respect to voter eligibility, this request covers, but is not limited to the following fields in TEAM (identified by currently understood field name as well as by field contents):

Field Name	Field Description
VOTER_COUNTY_ID	Internal database key
JUR_ID	aka Jurisdiction ID, County Number, or County Code
VUID	Voter Unique ID
LAST_NAME	Voter Last Name
FIRST_NAME	Voter First Name
MIDDLE_NAME	Voter Middle Name
FORMER_LAST_NAME	Voter Former Last Name
NAME_SUFFIX_CODE	Voter Name Suffix
SSN	Voter Social Security Number (complete where available, or last 4 digits where complete is unavailable)
GENDER_CODE	Voter Gender Code
OFFICIAL_ID_NUMBER	Texas Drivers License Number/Texas ID
DATE_OF_BIRTH	Voter Date of Birth-
VOTER_STATUS_CODE	Voter Status Code (V=Active, C=Cancelled, S=Suspense, L=Live Check Wait)
SPANISH_SURNAME_FG	Indicates whether Voter has a Spanish Surname (Y=Yes, N=No)
BLOCK_NUMBER	Voter Residential Block Number
DESIGNATOR	Voter Residential Designator
ST_DIR_PREFIX	Voter Residential Street Direction Prefix
STREET_NAME	Voter Residential Street Name
STREET_TYPE	Voter Residential Street Type

Field Name	Field Description
ST_DIR_SUFFIX	Voter Residential Street Direction Suffix
UNIT_NUMBER	Voter Residential Unit Number
UNIT_TYPE	Voter Residential Unit Type
PARCEL_NUMBER	Voter Residential Parcel Number
CITY	Voter Residential City Name
STATE	Voter Residential State Name
ZIP_CODE	Voter Residential ZipCode
MAIL_NAME	Voter Mailing Address Name
MAIL_ADRS_1	Voter Mailing Address Line1
MAIL_ADRS_2	Voter Mailing Address Line2
MAIL_CITY	Voter Mailing City Name
MAIL_STATE	Voter Mailing State Name
MAIL_ZIP_CODE	Voter Mailing Address ZipCode
PCT_CODE	Precinct Code
PCT_NAME	Precinct Name
LANGUAGE_CODE	Language Code
REGISTRATION_DATE	Voter Application Date
EDR	Effecive Date of Registration-
DISPLAY_CODE	Cancel Event Display Code (Filled-in for Cancelled Voters Only)
EVENT_CODE	Cancel Event Code (Filled-in for Cancelled Voters Only)
EVENT_DESC	Cancel Event Description (Filled-in for Cancelled Voters Only)
APPLICATION_SOURCE_CODE	Voter Application Source Code

b. With respect to voter history, this request covers, but is not limited to, the following fields in TEAM (identified by currently understood field name as well as by field contents):

Field Name	Field Contents
VUID	Voter Unique ID
JUR_ID	Jurisdiction ID, County Number, or County Code
HIST_TYPE_CODE	Voting History Type Code (recording whether early, absentee, or election day votes are accepted or rejected)
ACTIVITY_DATE	Date of Activity (Voted, Rejected, etc.)
PROVISIONAL_REJECT_REASON_CODE	Provisional Ballot Rejected Reason Code
TITLE	Provisional Ballot Rejected Reason Description
ELECTION_DATE	Election Date
ELECTION_TYPE_CODE	Election Type Code: (E.g., primary, general, runoff)
ELECTION_NAME	Election Name

c. With respect to implementation and enforcement of SB 1, this request includes the contents of any fields in TEAM necessary for implementation and enforcement of SB 1's requirements, including but not limited to the content of all fields recording which voters have requested an absentee ballot by mail application, have applied for an absentee ballot by mail, have had an absentee ballot by mail application rejected, have had an absentee ballot by mail application accepted, the reason for rejection of an absentee ballot by mail application, the reason for acceptance of an absentee ballot by mail application, the duration of an accepted absentee ballot by mail application (*e.g.*, annual or one election), whether a voter cast an absentee ballot by mail, whether an absentee ballot by mail was accepted, whether an absentee ballot by mail was rejected, and the reason an absentee ballot by mail was rejected.

d. This request seeks any and all other fields produced by the State of Texas from the TEAM database during *United States v. Texas*, No. 2:13-cv-263 (S.D. Tex.).

3.   The contents of all fields contained within the State of Texas's driver license and personal identification card database that could be used to match individuals against the State of Texas's TEAM voter registration database, to determine voter eligibility, or to determine whether an individual has been issued one or more identification documents named in Section 5.02 of SB 1 (to be codified at Tex. Elec. Code § 84.002) and Section 5.08 of SB 1 (to be codified at Tex. Elec. Code § 86.002). This request includes the content of all fields reflecting the full name, address (including city, state, county, and ZIP code), date of birth, Social Security account number, race, ethnicity, sex, driver license or personal identification card number, and disability status of all driver license and personal identification card holders, as well as the content of fields reflecting whether the driver license or identification card has expired, been suspended, or confiscated, and whether the license or identification or holder is deceased. This request covers but is not limited to the entire Admin and Issuance files; the Person ID, Transaction ID, Issuance ID, Transaction Type Code, and Last Update Date fields in the Transactions file; and the contents of following fields contained in the Person file:

a. DL/ID/UNL or EC Number

b. Person ID

c. First Name

d. Last Name

e. Middle Name

f. Suffix

g. Date of Birth

h. Social Security Number

i. Permanent Street Address 1

j. Permanent Street Address 2

k. Permanent City

l. Permanent State

m. Permanent Zip Code

n. Permanent Zip Code Ext.

o. Permanent County

p. Permanent Country

q. Mailing Street Address 1

r. Mailing Street Address 2

s.	Mailing City	dd.	AKA DL/ID Number
t.	Mailing State	ee.	Card Status
u.	Mailing Zip Code	ff.	Record Status
v.	Mailing Zip Code Ext.	gg.	Card Type
w.	Mailing County	hh.	Surrendered DL/ID Number
x.	Mailing Country	ii.	License Surrendered
y.	Sex	jj.	License Confiscated
z.	Race	kk.	DL Issuance Status
aa.	Disabled Veteran	ll.	ID Issuance Status
bb.	Homebound	mm.	License Status
cc.	AKA Name	nn.	Deceased Certificate Number

In addition, this request includes all definitional tables for individual fields described above, including but not limited to homebound, county, race, and country. This request seeks any and all other tables and fields produced by the State of Texas from the driver license and personal identification card database during *United States v. Texas*, No. 2:13-cv-263 (S.D. Tex.).

4.   The State of Texas's election identification certificate database, in its entirety with the exception of information on the hair color, height, and weight of election identification certificate applicants. This request includes data kept as a column within the State of Texas's driver license and personal identification card database. This request includes the content of all fields reflecting data collected through the election identification certification application (except for those on hair color, height, and weight) including the applicants' full name, residential and mailing addresses (including city, state, county, and ZIP code), date of birth, Social Security

account number, race, ethnicity, sex, as well as all data on underlying documentation presented,

and all dates of issuance or denial of issuance.

Date: November 12, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021, I served a true and correct copy of the foregoing via electronic mail on all counsel of record:

/s/ Michael E. Stewart
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